

Dennis F. Dunne (admitted *pro hac vice*)
Samuel A. Khalil (admitted *pro hac vice*)
MILBANK LLP
55 Hudson Yards
New York, New York 10001-2163
Telephone: (212) 530-5000
Facsimile: (212) 530-5219

and

Gregory A. Bray (SBN 115367)
Thomas R. Kreller (SBN 161922)
MILBANK LLP
2029 Century Park East, 33rd Floor
Los Angeles, CA 90067
Telephone: (424) 386-4000
Facsimile: (213) 629-5063

*Counsel for the Official Committee
of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

** All papers shall be filed in the Lead Case.
No. 19-30088 (DM)*

**THIRD STIPULATION BETWEEN
OFFICIAL COMMITTEE OF UNSECURED
CREDITORS AND UNITED STATES
TRUSTEE EXTENDING TIME TO
RESPOND TO APPLICATION TO RETAIN
AND EMPLOY AXIOM ADVISORS AS
GOVERNMENT AFFAIRS CONSULTANT
TO THE COMMITTEE [DOCKET NO.
1524]**

[No Hearing Requested]

This stipulation and agreement for order (the "Stipulation") is entered into by the
(i) Official Committee of Unsecured Creditors (the "Committee") appointed in the jointly

1 administered chapter 11 cases of the above-captioned debtors in possession, on the one hand; and
2 (ii) the Office of the United States Trustee (the “U.S. Trustee” and together with the Committee,
3 the “Parties”), on the other hand. The Parties hereby stipulate and agree as follows:

4 **RECITALS**

5 A. On April 17, 2019, the Committee filed the *Application of the Official Committee*
6 *of Unsecured Creditors for Authority to Retain and Employ Axiom Advisors as Government Affairs*
7 *Consultant, Effective as of March 15, 2019* [Docket No. 1524] (the “Axiom Application”), which
8 is set for hearing before the Court at 9:30 a.m. (Pacific Time) on May 9, 2019. Any response or
9 opposition to the Axiom Application was originally due by 4:00 p.m. (Pacific Time) on May 1,
10 2019.
11

12 B. On May 1, 2019, the Court entered the *Order Granting Stipulation Between Official*
13 *Committee of Unsecured Creditors and United States Trustee Extending Time to Respond to*
14 *Application to Retain and Employ Axiom Advisors as Government Affairs Consultant to the*
15 *Committee* [Docket No. 1796], extending the time by which the U.S. Trustee may file any response
16 or opposition to the Axiom Application to 4:00 p.m. (Pacific Time) on May 3, 2019.
17

18 C. On May 3, 2019, the Court entered the *Order Granting Second Stipulation Between*
19 *Official Committee of Unsecured Creditors and United States Trustee Extending Time to Respond*
20 *to Application to Retain and Employ Axiom Advisors as Government Affairs Consultant to the*
21 *Committee* [Docket No. 1843], further extending the time by which the U.S. Trustee may file any
22 response or opposition to the Axiom Application to 4:00 p.m. (Pacific Time) on May 6, 2019.
23

24 D. Counsel to the U.S. Trustee has requested, and counsel to the Committee has
25 agreed, that the time for the U.S. Trustee to respond to the Axiom Application be further extended.
26
27
28

1 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
2 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
3 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH**
4 **THE UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT**
5 **TO ORDER, THAT:**

6 1. The time for the U.S. Trustee to file and serve any response or opposition to the
7 Axiom Application is extended through 4:00 p.m. (Pacific Time) on May 7, 2019.

8 *[Signatures on next page]*
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: May 6, 2019

MILBANK LLP

/s/ Thomas R. Kreller

Thomas R. Kreller

*Attorneys for Official Committee of
Unsecured Creditors*

Dated: May 6, 2019

OFFICE OF THE UNITED STATES
TRUSTEE

/s/ Marta E. Villacorta

Marta E. Villacorta

Trial Attorney

*Attorney for Andrew R. Vara, Acting
United States Trustee for Region 3¹*

¹ Andrew R. Vara, Acting United States Trustee for Region 3, is acting in this appointment for Tracy Hope Davis, United States Trustee for Region 17, who is recused from the above-captioned cases.